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MICHIGAN LAW REVIEW

PUBLISHED MONTHLY DURING THE ACADEMIC YEAR, EXCLUSIVE OF OCTOBER, BY THE
LAW FACULTY OF THE UNIVERSITY OF MICHIGAN

SUBSCRIPTION PRICE, \$2.50 PER YEAR, 35 CENTS PER NUMBER

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NOTE AND COMMENT

SARAH CASWELL, ANGELL

On December seventeenth there passed away from us a gentle woman whose life here, for almost a third of a century, has been a continuous benefaction.

She would be the first to disapprove now of mere eulogy, but her genuine and innate sympathy would respond to any grateful and sincere expression of respect.

This is not the place in which to speak at length of her life of generous service; hundreds will bear—as hundreds have borne—their testimony to that life; we but briefly note the gratitude of all who have known her for the example of a long life well spent, and their deep sense of bereavement in its earthly ending.

Endowed by nature with lofty qualities of heart and mind, she was eminently fitted for the responsibilities and opportunities of her position. With simple and gracious dignity she used hospitality, with unfeigned and generous sympathy she shared the sorrows and joys of all, with rare tact she checked the growth of anything like envy; no word of unkind criticism ever passed her lips, but with native charity for human weakness she yet showed forth in her own life and speech the positive virtues of Christian womanhood.

THE STUDENTS OF THE LAW DEPARTMENT adopted the following resolutions:—

Whereas, After a long life of usefulness and philanthropy which has been a blessing and an inspiration to the students of our University, an all-wise

Providence has been pleased to call Mrs. Sarah Caswell Angell to enter upon that higher life toward which her pure spirit and exalted character have ever tended,

Resolved, That the students of the Law Department of the University of Michigan, hereby extend to President Angell, the family and friends, their sincere and profound sympathy.

Resolved, also, That a copy of these resolutions be sent to President Angell and that they be published in the newspapers of the city.

C. N. BOARD,
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JOHN TRUAX, '04,

D. F. CARSON,
A. G. AIGLER,
W. S. NASH, '05,

E. D. WOOLEY,
E. A. WILLS,
C. L. DIBBLE, '06
Committees.

THE CONFERENCE OF COMMISSIONERS ON UNIFORM STATE LAWS.—There should be more general and grateful recognition of the services of the National Conference of Commissioners on Uniform State Laws. For the past twelve years this body, composed of Commissioners from the several states, has met in annual conference for the consideration of specific measures calculated to bring about uniformity of law throughout the Union on matters where uniformity is desirable. The Commissioners, generally men of ability, learning and extensive experience in the practice of their profession, have devoted themselves earnestly, wisely and unselfishly to the accomplishment of the work of reforming our variant and confusing state laws.

Probably the appreciative and intelligent consideration and criticism of measures recommended by them would be for such men the fairest recompense for their thought and time devoted to the common welfare. While their efforts have been in some directions eminently successful, they nevertheless have had to contend against a vast amount of apathy, ignorance and state pride. And there may still be found so-called lawyers who, as our inter-state business increases, oppose uniformity with a deliberate, though short-sighted, selfishness.

Hon. Amasa M. Eaton, whose article on the Negotiable Instruments Law we publish in this issue, is the President of the Conference, and has taken an active part in the work connected with the drafting and introduction of this law. There can be no doubt as to both the desirability and practicability of a uniform law on this subject and the difference of opinion in regard to the law relates, not to these matters, but to certain of its features which are fully discussed in Mr. Eaton's paper. The matter is one of such importance as to make his review of the law and recent decisions under it of especial value in view of the fact that it is before legislative Committees of several states.

ROYAL PREROGATIVE—TREASURE TROVE.—A proof of the saying that there is nothing obsolete in the law is furnished by the recent case of *Attorney-General v. Trustees of the British Museum* [1903], 2 Ch.598, involving the curious learning on the law of treasure trove. Certain gold ornaments and other articles of ancient Celtic manufacture were ploughed up on a farm in the north of Ireland. They were acquired in good faith by the defendants acting for the British Museum and were subsequently claimed by the crown for the reason "that the articles had been discovered concealed in the earth; that the owner of them at the time of their being concealed was unknown and that